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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,

vs.

JUNG JIN CORPORATION, a CNMI corporation,
ASIA ENTERPRISES, INC., a CNMI corporation,
PARK HWA SUN, KIM HANG KWON,
KSK CORPORATION, a CNMI corporation,
and KIM KI SUNG,

Defendants.

NOTICE OF RULE 30(b)(6)
DEPOSITION OF KSK CORP.

TO: KELLEY M. BUTCHER, ESQ.
Attorney for Defendants KSK CORPORATION and KIM KI SUNG

PLEASE TAKE NOTICE that, pursuant to Rules 26, 28 and 30 of the Federal Rules of Civil Procedure, on **Thursday, March 13, 2008, at the hour of 9:30 a.m.** at the law office of Mark B. Hanson, Second Floor, Macaranas Building, Beach Road, Garapan, Saipan, Commonwealth of the Northern Mariana Islands, Plaintiffs' attorney will take the deposition of Defendant KSK CORPORATION, PMB 234, P.O. Box 10,001, Saipan, MP 96950 ("KSK"), said deposition to continue from day to day until completed. Such deposition will be taken upon oral examination for the purpose of discovery, or as evidence, or both, pursuant to the Federal Rules of Civil Procedure,

1 before the undersigned who will administer the oath and shall be the officer before whom the
2 deposition is taken as that term is used in Fed. R. Civ. P. 28(a).

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4 Pursuant to Rule 30(b)(6), KSK shall, as known or reasonably available to it, designate and
5 produce for deposition one or more of the KSK's officers, directors, employees, managing agents,
6 consultants, auditors or other persons who consent to testify on KSK's behalf as to the subject
7 matters identified below for the time period from November 2002 through the date of the deposition
8 noticed hereunder including any continuance thereof (unless otherwise stated):

- 9 1. The review of documents in the possession, custody or control of KSK and the preparation a
10 the response thereafter to Plaintiffs' First Request for Production of Documents to KSK;
- 11 2. The substance of the documents produced by KSK in response to Plaintiffs' First Request for
12 Production of Documents to KSK;
- 13 3. The lending of money by KSK to anyone within the time period stated above, including the
14 preparation and execution of all documentation thereof;
- 15 4. The borrowing of money by KSK from anyone within the time period stated above, including
16 the preparation and execution of all documentation thereof;
- 17 5. The substance of the document attached hereto as Exhibit "A";
- 18 6. The nature and extent of any interest KSK has or previously had in any business entity,
19 whether a sole proprietorship, partnership, corporation, limited liability company, or any non-
20 profit association or corporation or any other business entity, that has or had any part of its
21 operations in the Commonwealth of the Northern Mariana Islands at any time from January
22 2000 through the date of the deposition noticed hereunder including any continuance thereof;
- 23 7. The substance of KSK's bank records and the keeping of its bank accounts, generally and with
24 respect to periodic deposits and withdrawals therefrom;
- 25 8. The substance of KSK's tax records and the preparation of all tax returns filed by KSK with
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1 any government agency;

2 9. The hiring, firing and employment of any employees of KSK, including Defendant Kim Ki
3 Sung;

4 10. All information disclosed in KSK's "Rule 26 Discovery Disclosures" and any supplements
5 thereto up to and including the day of the deposition noticed hereunder including any
6 continuance thereof;

7 11. All responses to any additional discovery served by Plaintiffs on Defendants, or any of them,
8 prior to the day of the deposition noticed hereunder including any continuance thereof;

9 12. Plaintiffs' allegations in their Second Amended Verified Complaint;

10 13. Defendants' Answer to Plaintiffs' Second Amended Verified Complaint and the factual basis
11 for the affirmative defenses contained therein;

12 14. The relationships of the other defendants in this case to KSK, including but not limited to any
13 stock ownership, officer, director or manager positions, dates of stock ownership,
14 appointment, election, and/or employment, their duties and responsibilities, and their
15 authority to enter into agreements on behalf of KSK or otherwise bind KSK by their actions;

16 15. The operations, income and expenses of KSK; and

17 16. The assets of KSK including, but not limited to any actual or intended disposition of such
18 assets.

19 Pursuant to the provisions of Fed. R. Civ. Pro. 30(b)(2), you are hereby notified that the
20 deposition shall be recorded by video tape and digital voice recorder rather than stenographic means.

21 You are invited to attend and cross-examine.

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1 DATED this 22nd day of February, 2008.

3 /s/ Mark B. Hanson

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 MARK B. HANSON

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10 Facsimile: (670) 233-5262
11 E-Mail Address: mark@saipanlaw.com

12 Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be deposited in the United States Post Office,
first class mail, postage prepaid, addressed to the following:

Jung Jin Corporation
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Park Hwa Sun
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Asia Enterprises Inc.
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

I further certify that the following were served with a copy of the foregoing via the Court's
electronic case filing system and via e-mail:

G. Anthony Long
Kelley M. Butcher
LAW OFFICES OF G. ANTHONY LONG
P.O. Box 504970
Saipan, Mariana Islands 96950
E-mail: gal@nmilaw.com
kmb@nmilaw.com

DATED: February 22, 2008

/s/ Mark B. Hanson

MARK B. HANSON